

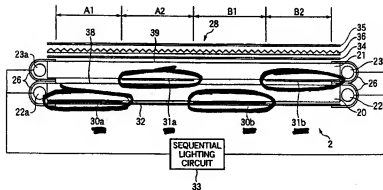
REMARKS

Claims 1-4, 27 and 34-39 stand rejected under 35 U.S.C. §103 as being unpatentable over United States Patent No. 6,496,236 to Cole et al. in view of United States Patent Application Publication No. 2002/0001184 to Kim et al. Applicants respectfully traverse this rejection.

Applicants respectfully submit that the cited references fail to disclose or suggest all of the features defined in independent Claims 1, 36 and 37. Specifically, the cited references do not disclose or suggest an illumination device that includes, *inter alia*, “a plurality of optical waveguides each having a plurality of separate light diffusion reflecting layers thereon” (emphasis added), as defined in independent Claim 1. A similar feature is also defined in independent Claims 36 and 37 with the following language: “a plurality of optical waveguides each including a plurality of separate light diffusion reflecting surfaces” (emphasis added).

One example of an embodiment of the invention defined in Claim 1 is shown in Applicants’ Figures 1 and 2, which includes, among other things, a plurality of optical waveguides (20 and 21) that each include a plurality of separate light diffusion reflecting layers thereon. More specifically, as shown below optical waveguide 20 includes light diffusion reflecting layers 30a and 30b thereon (as circled below), which, as can be seen in Figure 2, are separate from each other.

FIG.2 (MARKED-UP)



Similarly, optical waveguide 21 includes light diffusion reflecting layers 31a and 31b thereon, which, as can be seen in the marked-up version of Figure 2 above (where layers 31a and 31b are also circled), are also separate from each other. Thus, as defined in independent Claim 1, each optical waveguide includes a plurality of separate light diffusion reflecting layers thereon.

In contrast, the device of the Cole et al. reference lacks the plurality of separate light diffusion layers on each optical waveguide, as recited in independent Claim 1. In the Office Action, the Examiner equated light pipes 76 and 78 of Figure 3C of the Cole et al. reference with the claimed optical waveguides, and he equated reflectors 26 and 28 with the claimed light diffusion reflecting layers. However, even assuming *arguendo* that the light pipes 76 and 78 were equivalent to the claimed optical waveguides and that the reflectors 26 and 28 were equivalent to the claimed light diffusion reflecting layers, Claim 1 is still not satisfied. More specifically, Figure 3C of Cole et al. shows only a single reflector 26 associated with light pipe 26. Accordingly, light pipe 26 of Cole et al. does not satisfy the language of Claim 1 that states that each of the plurality of optical waveguide includes a

plurality of separate light diffusion reflecting layers thereon. Applicants also respectfully submit that the Cole et al. reference fails to satisfy the similar language of independent Claims 36 and 37 that defines “a plurality of optical waveguides each including a plurality of separate light diffusion reflecting surfaces for diffusing and reflecting guided light” (emphasis added).

Additionally, Applicants respectfully submit that the Kim et al. reference does not remedy the deficiencies noted above, nor was it relied upon as such. Accordingly, for at least the reasons set forth above, Applicants respectfully request the withdrawal of this §103 rejection of independent Claims 1, 36, and 37, and associated dependent Claims 2-4, 27, 34, 35, 38 and 39.

Additionally, Applicants also respectfully submit that the combination of Cole et al. and Kim et al. also lacks other details of the optical waveguides and light diffusion reflecting layers (or surfaces), as defined in independent Claims 1, 36 and 37. More specifically, the proposed combination also lacks “a plurality of optical waveguides each including . . . a light emission surface for emitting the diffused and reflected light, and a plurality of light-emitting areas each corresponding to a location in which one of the light diffusion reflecting layers [surfaces, for Claims 36 and 37] is formed and which light emitting areas are separated from each other, the plurality of optical waveguides being stacked so that the plurality of light emitting areas are disposed almost complementarily and adjacent each other when viewed in a direction perpendicular to the light emission surface” (emphasis added), as defined in independent Claims 1, 36 and 37.

Referring again to Applicants' marked-up Figure 2 (above), one example of an embodiment that includes the features of the previous paragraph is shown. More specifically, marked-up Figure 2 shows a plurality of optical waveguides (20 and 21) each including . . . a light emission surface (surface 38 for waveguide 20 and surface 39 for waveguide 21) for emitting the diffused and reflected light, and a plurality of light-emitting areas (A1, B1, A2, B2) each corresponding to a location in which one of the light diffusion reflecting layers/surfaces (areas A1, B1, A2, B2 correspond to layers/surfaces 30a, 30b, 31a and 31b, respectively) is formed and which light emitting areas (A1, B1, A2, B2) are separated from each other (A1 and B1 for 30a and 30b are separated and A2 and B2 for 31a and 31b are separated), the plurality of optical waveguides (20, 21) being stacked so that the plurality of light emitting areas (A1, B1, A2, B2) are disposed almost complementarily and adjacent each other when viewed in a direction perpendicular to the light emission surface (38, 39).

In contrast, the device of the Cole et al. patent lacks the features of independent Claims 1, 36 and 37 discussed immediately above. For example, lightpipe 76 of Figure 3C of Cole et al. does not include a plurality of separate light diffusion layers/surfaces, so it also fails to include a plurality of corresponding light emitting areas that are separated from each other (such as light emitting areas A2 and B2 of Applicants' Figure 2). Instead, lightpipe 76 of Cole et al. has a single reflector 76 that forms a single, continuous, corresponding light emitting area, with no separation. Similarly, lightpipe 78 also fails to include a plurality of separate light diffusion layers/surfaces and a plurality of corresponding light emitting areas that are separated from each other (such as light emitting areas A1 and B1 of Applicants'

Figure 2). Instead, lightpipe 78 of Cole et al. also only defines a single, continuous light emitting area with no separation.

Further, the Kim et al. reference does not remedy this deficiency, nor was it relied upon as such. Accordingly, for these reason also, Applicants respectfully request the withdrawal of this §103 rejection of independent Claims 1, 36 and 37 and associated dependent Claims 2-4, 27, 34, 35, 38 and 39.

For all of the above reasons, Applicants request reconsideration and allowance of the claimed invention. Should the Examiner be of the opinion that a telephone conference would aid in the prosecution of the application, or that outstanding issues exist, the Examiner is invited to contact the undersigned attorney.

If a Petition under 37 C.F.R. §1.136(a) for an extension of time for response is required to make the attached response timely, it is hereby petitioned under 37 C.F.R. §1.136(a) for an extension of time for response in the above-identified application for the period required to make the attached response timely. The Commissioner is hereby authorized to charge fees which may be required to this application under 37 C.F.R. §§1.16-1.17, or credit any overpayment, to Deposit Account No. 07-2069.


Respectfully submitted,

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